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October 16, 2013

VIA ELECTRONIC FILING

Hon. William H. Walls, Senior Judge
M.L. King, Jr. Federal Building & Courthouse
50 Walnut Street
Room 4046
Newark, NJ 07102

RE: Kim, et al. v. Dongbu Tour
& Travel, Inc. et al.

Docket No.: 12-cv-1136 (WHW) (SCM)
Our File: 38,444-0

Dear Judge Walls:

Please accept this letter expressing Plaintiffs' response to Defendants' motion [Dkt. #84] for an order granting (A) withdrawal of Michael S. Kimm as Defendants' counsel in this action, and (B) sixty days for Defendants to retain new counsel. That motion is supported by a companion motion to file the supporting declaration of Michael S. Kimm, Esq. under seal.

According to the Defendants' motion to submit Mr. Kimm's declaration under seal [Dkt. #85-1], Mr. Kimm's declaration "discusses private client matters that should not be disseminated or publicly available. It also includes potential defense strategies that may be utilized by plaintiffs' counsel if the information is made publicly available."

Since Plaintiffs do not have access to the declaration itself, Plaintiffs are unable to comment on the merits of Mr. Kimm's withdrawal motion, and take no position in regard thereto.

However, Plaintiffs believe that sixty days is an unduly long period for Defendants to retain new counsel.

Respectfully submitted,

/s/Charles R. Cohen
Charles R. Cohen

CRC:me

cc: Michael S. Kimm, Esq. (Via ECF and Electronic Mail)